

Elizabeth J. Cabraser (SBN 083151)
Kevin R. Budner (SBN 287271)
Evan J. Ballan (SBN 318649)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008

Attorneys for Fire Claimants

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
Jointly Administered)

(Jointly Administered)

**JOINDER TO OMNIBUS OBJECTIONS
OF THE OFFICIAL COMMITTEE OF
TORT CLAIMANTS (SUBSTANTIVE)
TO CLAIMS FILED BY THE
DEPARTMENT OF HOMELAND
SECURITY/FEDERAL EMERGENCY
MANAGEMENT AGENCY (CLAIMS
NOS. 59692, 59734 & 59783) AND TO
CLAIMS FILED BY CALIFORNIA
GOVERNOR'S OFFICE OF
EMERGENCY SERVICES (CLAIM
NOS. 87748, 87754, & 87755)**

Date: February 26, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Re: Docket Nos. 4943, 5096, 5319, 5320

Undersigned counsel represents a number of individuals and businesses (the “**Fire Claimants**”) who suffered wrongful death, personal injury, property, and economic losses and damages as a result of wildfires caused by PG&E and whose state court cases have been stayed as a result of this Bankruptcy, including those identified in Attachment 1 who filed claims in state court that have been stayed as a result of this Bankruptcy. The **Fire Claimants** hereby support and join the following objections filed by the Official Committee of Tort Claimants (the “**TCC**”): (i) *Omnibus Objection of the Official Committee of Tort Claimants (Substantive) to Claims Filed by the Department of Homeland Security/Federal Emergency Management Agency (Claim Nos. 59692, 59734 & 59783) [Dkt. No. 4943]* (the “**TCC FEMA Objection**”); (ii) *Supplement To Omnibus Objection of the Official Committee of Tort Claimants (Substantive) to Claims Filed by the Department of Homeland Security/Federal Emergency Management Agency (Claim Nos. 59692, 59734 & 59783) [Dkt. No. 5319]* (the “**TCC Supplemental FEMA Objection**”) (iii) *Omnibus Objection of the Official Committee of Tort Claimants (Substantive) to Claims Filed by California Governor’s Office of Emergency Services (Claim Nos. 87748, 87754, & 87755) [Dkt. No. 5096]* (the “**TCC Cal OES Objection**”); and (iv) *Supplement to Omnibus Objection of the Official Committee of Tort Claimants (Substantive) to Claims Filed by California Governor’s Office of Emergency Services (Claim Nos. 87748, 87754, & 87755) [Dkt. No. 5320]* (the “**TCC Supplemental Cal OES Objection**,” and together with the TCC FEMA Objection, the TCC Supplemental FEMA Objection, and the TCC Cal OES Objection, the “**Objections**”).

JOINDER

Pursuant to Section 502(b)(1) of the Bankruptcy Code, a claim is not allowed if the claim “is unenforceable against the debtor . . . under any . . . applicable law.” 11 U.S.C. § 502(b)(1). The Fire Victims support and join in all arguments asserted in the Objections.

The Fire Claimants reserve all rights to be heard before the Court in connection with the Objections (and any joinders thereto), to amend, supplement, or otherwise modify this Joinder prior to or during the preliminary hearing on the Objections, and to assert such other and further objections prior to the final adjudication of the matter.

For the reasons set forth in the Objections, the Fire Claimants respectfully request that the

1 Court enter an order disallowing and expunging the FEMA Claims and the Cal OES Claims
2 identified in the Objections.

3 Dated: February 12, 2020

LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP

4
5 By: /s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser

6
7 Elizabeth J. Cabraser (SBN 083151)
Kevin R. Budner (SBN 287271)
Evan J. Ballan (SBN 318649)
8 LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
9 275 Battery Street, 29th Floor
10 San Francisco, CA 94111-3339
11 Telephone: (415) 956-1000
Facsimile: (415) 956-1008

12 *Attorneys for Fire Claimants*
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Attachment 1

The **Fire Claimants** include the plaintiffs in the following state court actions, which have been stayed pending the resolution of these bankruptcy proceedings:

Abrams, et al. v. Pacific Gas & Electric Company, et al., Case No. CGS-18-563582 (Superior Court of San Francisco); *Anderson v. Pacific Gas & Electric Company, et al.*, Case No. CGC-17-563387 (Superior Court of San Francisco); *Olds, et al. v. Pacific Gas & Electric Company, et al.*, Case No. CGC-17-562791 (Superior Court of San Francisco); *Berghof, et al. v. Pacific Gas & Electric Company, et al.*, Case No. CGC-18-568065 (Superior Court of San Francisco); *Bostan, et al. v. Pacific Gas & Electric Company, et al.*, Case No. CGC-17-562990 (Superior Court of San Francisco); *Brandt-Hawley, et al. v. Pacific Gas & Electric Company, et al.*, Case No. CGC-19-573264 (Superior Court of San Francisco); *Cordes v. Pacific Gas & Electric Company, et al.*, Case No. CGC-19-573262 (Superior Court of San Francisco); *Daniels, et al. v. Pacific Gas & Electric Company, et al.*, Case No. CGC-19-573259 (Superior Court of San Francisco); *Fraser v. Pacific Gas & Electric Company, et al.*, Case No. CGC-18-568064 (Superior Court of San Francisco); *Gilchrist v. Pacific Gas & Electric Company, et al.*, Case No. CGC-19-573342 (Superior Court of San Francisco); *Green Valley Ranch, LLC, et al. v. Pacific Gas & Electric Company, et al.*, Case No. CGC-19-573343 (Superior Court of San Francisco); *Hays v. Pacific Gas & Electric Company, et al.*, Case No. CGC-19-573270 (Superior Court of San Francisco); *Houser, et al. v. Pacific Gas & Electric Company, et al.*, Case No. CGC-18-569781 (Superior Court of San Francisco); *Kerwin v. Pacific Gas & Electric Company, et al.*, Case No. CGC-19-573265 (Superior Court of San Francisco); *Kooker v. Pacific Gas & Electric Company, et al.*, Case No. CGC-19-573437 (Superior Court of San Francisco); *Lippman, et al. v. Pacific Gas & Electric Company, et al.*, Case No. CGC-19-573267 (Superior Court of San Francisco); *Louie v. Pacific Gas & Electric Company, et al.*, Case No. CGC-19-573340 (Superior Court of San Francisco); *Marshank, et al. v. Pacific Gas & Electric Company, et al.*, Case No. CGC-18-568171 (Superior Court of San Francisco); *Maxwell v. Pacific Gas & Electric Company, et al.*, Case No. CGC-18-566345 (Superior Court of San Francisco); *McCallum, et al. v. Pacific Gas & Electric Company, et al.*, Case No. CGC-18-570122 (Superior Court of San Francisco);

1 *Meek, et al. v. Pacific Gas & Electric Company, et al.*, Case No. CGC-18-568347 (Superior Court
2 of San Francisco); *Merjil, et al. v. Pacific Gas & Electric Company, et al.*, Case No. CGC-17-
3 563273 (Superior Court of San Francisco); *Miller, et al. v. Pacific Gas & Electric Company, et*
4 *al.*, Case No. CGC-19-573341 (Superior Court of San Francisco); *Miller, et al. v. Pacific Gas &*
5 *Electric Company, et al.*, Case No. CGC-19-573274 (Superior Court of San Francisco); *Peacock,*
6 *et al. v. Pacific Gas & Electric Company, et al.*, Case No. CGC-19-573276 (Superior Court of
7 San Francisco); *Rastelli v. Pacific Gas & Electric Company, et al.*, Case No. CGC-19-573344
8 (Superior Court of San Francisco); *Roos, v. Pacific Gas & Electric Company, et al.*, Case No.
9 CGC-19-573278 (Superior Court of San Francisco); *Sher, et al. v. Pacific Gas & Electric*
10 *Company, et al.*, Case No. CGC-18-568985 (Superior Court of San Francisco); *Sweet, et al. v.*
11 *Pacific Gas & Electric Company, et al.*, Case No. CGC-18-563700 (Superior Court of San
12 Francisco); *Tomlinson, et al. v. Pacific Gas & Electric Company, et al.*, Case No. CGC-19-
13 573272 (Superior Court of San Francisco); *Voliter, et al. v. Pacific Gas & Electric Company, et*
14 *al.*, Case No. CGC-18-571548 (Superior Court of San Francisco); *Wasem, et al. v. Pacific Gas &*
15 *Electric Company, et al.*, Case No. CGC-17-563389 (Superior Court of San Francisco);
16 *Woodward, et al. v. Pacific Gas & Electric Company, et al.*, Case No. CGC-19-573345 (Superior
17 Court of San Francisco); *Loo, et al. v. Pacific Gas & Electric Company, et al.*, Case No. CGC-18-
18 572078 (Superior Court of San Francisco); *Burnett, et al. v. Pacific Gas & Electric Company, et*
19 *al.*, Case No. CGC-18-571849 (Superior Court of San Francisco); *Adams, et al. v. Pacific Gas &*
20 *Electric Company, et al.*, Case No. CGC-19-573346 (Superior Court of San Francisco); *Brady, et*
21 *al. v. Pacific Gas & Electric Company, et al.*, Case No. CGC-19-573347 (Superior Court of San
22 Francisco).